

EXHIBIT 4

Aisha Bemby

From: Aisha Bemby
Sent: Tuesday, August 18, 2015 9:43 AM
To: 'Haefele, Robert'; 'Carter, Sean (SCarter1@cozen.com)'; 'Tarbutton, J. Scott (STarbutton@cozen.com)'; 'Andrew J. Maloney (AMaloney@kreindler.com)'; 'WTC[jgoldman@andersonkill.com] (jgoldman@andersonkill.com)'; 'WTC[jkreindler@kreindler.com] (jkreindler@kreindler.com)'
Cc: Eric L. Lewis; Waleed Nassar
Subject: RE: MDL - 1570 - Letter re Documents Produced in December 2014

Robert,

Your request for specific examples of grammatical errors and erroneous information contained within the documents at issue is concerning, as we fail to see how this information will assist you in getting a better handle on addressing our request for information about the source of the documents and the manner in which plaintiffs obtained and later produced them. Nevertheless, to move the discussion forward, we provide the following broad overview of the examples you seek, reserving all rights: documents purportedly authored by native Arabic speakers contain the most elementary of Arabic language grammatical errors and misspellings, which include, without limitation, masculine/feminine confusion, plural/singular usage error, misspellings, and improper word usages; the "offices" identified in several of the documents refer to names that were never used by MWO or IIRO; and documents assertedly on organization letterhead are purportedly signed by individuals many years *after* their employment with MWL or IIRO ended.

We trust that the foregoing provides you with the information you have requested and request that you provide proposed dates and times for a conference call later this week (Wednesday or Friday works best for us) or next week.

We also request that in advance of the call Plaintiffs identify (i) the source of each document identified in our letter dated June 26th, and (ii) specify the manner in which each document was obtained. It has been over 7 weeks since we provided the requested letter that details the information we seek with regard to these documents and, while we can appreciate that you may need time to gather all the information requested, we would like to have some basic, readily available information about the provenance of the documents in advance of the call so that we can better prepare for our discussion. If Plaintiffs are unable or unwilling to provide the requested information in advance of the call, please let us know why that is the case.

We look forward to hearing from you.

Best regards,
Aisha

From: Haefele, Robert [mailto:rhaefele@motleyrice.com]
Sent: Thursday, August 13, 2015 5:40 PM
To: Aisha Bemby; 'Carter, Sean (SCarter1@cozen.com)'; 'Tarbutton, J. Scott (STarbutton@cozen.com)'; 'Andrew J. Maloney (AMaloney@kreindler.com)'; 'WTC[jgoldman@andersonkill.com] (jgoldman@andersonkill.com)'; 'WTC[jkreindler@kreindler.com] (jkreindler@kreindler.com)'
Subject: RE: MDL - 1570 - Letter re Documents Produced in December 2014

Aisha – In reviewing these documents, we are having difficulty identifying the grammatical errors or erroneous information that you are referencing. So that we can have a better handle on addressing what the concerns might be, can you please offer specifics. I would like to have that additional information in advance of another conference. That said, if you can get me the information, I think we can arrange a conference some mutually convenient time next week. Thanks.

Robert T. Haefe | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464 | rhaefe@motleyrice.com
o. 843.216.9184 | c. 843.834.1951 | f. 843.216.9450

From: Aisha Bembry [<mailto:aisha.bembry@lewisbaach.com>]
Sent: Thursday, August 06, 2015 12:56 PM
To: 'Carter, Sean (SCarter1@cozen.com)' <SCarter1@cozen.com>; Haefe, Robert <rhaefe@motleyrice.com>; 'Tarbutton, J. Scott (STarbutton@cozen.com)' <STarbutton@cozen.com>; 'Andrew J. Maloney (AMaloney@kreindler.com)' <AMaloney@kreindler.com>; 'WTC[jgoldman@andersonkill.com] (jgoldman@andersonkill.com)' <jgoldman@andersonkill.com>; 'WTC[jkreindler@kreindler.com] (jkreindler@kreindler.com)' <jkreindler@kreindler.com>
Cc: Eric L. Lewis <Eric.Lewis@lewisbaach.com>; Waleed Nassar <Waleed.Nassar@lewisbaach.com>
Subject: FW: MDL - 1570 - Letter re Documents Produced in December 2014

I misspoke below. Our June 26 letter is attached again for your convenience. Please get back to me as soon as possible with options for a call next week.

Regards,
Aisha

From: Aisha Bembry
Sent: Thursday, August 06, 2015 12:50 PM
To: 'Carter, Sean (SCarter1@cozen.com)'; 'Haefe, Robert' (rhaefe@motleyrice.com); 'Tarbutton, J. Scott (STarbutton@cozen.com)'; 'Andrew J. Maloney (AMaloney@kreindler.com)'; 'WTC[jgoldman@andersonkill.com] (jgoldman@andersonkill.com)'; 'WTC[jkreindler@kreindler.com] (jkreindler@kreindler.com)'
Cc: Eric L. Lewis; Waleed Nassar
Subject: FW: MDL - 1570 - Letter re Documents Produced in December 2014

Counsel,

Please let us know your availability for a call next week to discuss our outstanding request for additional information regarding the provenance of certain documents produced by Plaintiffs in December 2014. Our July 26 letter is attached again for your convenience.

Thanks,
Aisha

From: Aisha Bembry
Sent: Friday, June 26, 2015 12:50 PM
To: Carter, Sean (SCarter1@cozen.com); 'Haefe, Robert' (rhaefe@motleyrice.com); Tarbutton, J. Scott (STarbutton@cozen.com); Andrew J. Maloney (AMaloney@kreindler.com); WTC[jgoldman@andersonkill.com] (jgoldman@andersonkill.com); WTC[jkreindler@kreindler.com] (jkreindler@kreindler.com)
Cc: Eric L. Lewis; Waleed Nassar
Subject: MDL - 1570 - Letter re Documents Produced in December 2014

Gentlemen,

Further to our discussion earlier this week, please see the attached correspondence.

Best regards,
Aisha

Aisha E. Bembry

Lewis | Baach pllc

1899 Pennsylvania Ave., NW
Suite 600
Washington, DC 20006
202.659.6752 direct dial

[Bio](#) | [Email](#) | [Website](#) | [vCard](#)

Please note my new last name and email address.

This communication is confidential and may contain privileged information. If you have received this communication in error, please delete it and advise the sender by reply e-mail. Thank you.

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney-client privileged and confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies--electronic, paper or otherwise--which you may have of this communication.